

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

**MONTHLY FEE STATEMENT OF STINSON LLP FOR COMPENSATION OF
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE MONTH OF JANUARY 2024**

Pursuant to the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [ECF No. 117] (the "Interim Compensation Order"), Stinson LLP ("Stinson"), counsel to the Official Committee of Unsecured Creditors (the "Committee"), hereby files this monthly fee statement (the "Monthly Fee Statement") seeking compensation for reasonable and necessary services rendered to the Committee from January 1, 2024 through January 31, 2024 (the "Compensation Period") in the amount of \$51,326.40 (80% of \$64,158.00)¹ and reimbursement of actual and necessary expenses incurred during the Compensation Period in the amount of \$164.00.

Stinson's invoice for the Compensation Period, attached hereto as **Exhibit A**, includes the names, titles, billing rates, aggregate hours worked, and a description of services performed for all Stinson professionals and paraprofessionals who provided services to the Committee during the

¹ This Monthly Fee Statement includes a request for fees incurred by Stinson LLP in connection with the Committee's investigation of Interstate's improper disclosure of confidential survivor information (Task Code B500). Stinson LLP thus seeks \$46,584.80 (80% of \$58,231.00) in fees and \$164.00 in expenses from the Diocese, and \$4,741.60 (80% of \$5,927.00) in fees from Interstate. Stinson LLP, at such time as the fees and expenses detailed in this monthly fee statement may be paid, will separately request reimbursement from the Diocese and Interstate for these amounts.

Compensation Period and a list of expenses Stinson incurred during the Compensation Period in connection with providing services to the Committee.

Date: February 19, 2024

/s/ Robert T. Kugler

Robert T. Kugler (MN # 194116)

Edwin H. Caldie (MN # 388930)

Stinson LLP

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*Counsel for the Official Committee of
Unsecured Creditors*

EXHIBIT A



PO Box 843052
Kansas City, MO 64184-3052
1.800.846.1201

February 19, 2024

Diocese of Syracuse Tort Claimants Committee
N/A
N/A

Invoice No: 43547515
Robert T Kugler

Re: Diocese of Syracuse
File No: 3520516.0002

Invoice Summary

Professional services and disbursements rendered through January 31, 2024

Current Professional Services	\$64,158.00
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Current Disbursements	\$164.00
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Total Current Invoice	\$64,322.00
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Additional Information:

Remaining Trust Balance	\$100.00
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Payment Terms: Net 30

Tax ID #44-0643135

Stinson LLP

Invoice Detail

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Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Andrew Glasnovich	Partner	455.00	0.80	364.00
Christopher Sevedge	Partner	380.00	3.80	1,444.00
Edwin H Caldie	Partner	550.00	20.20	11,110.00
Robert T Kugler	Partner	550.00	44.50	24,475.00
Zachary Hemenway	Partner	500.00	4.30	2,150.00
Logan Kugler	Associate	390.00	54.20	21,138.00
Logan Kugler	Associate		12.50	No Charge
Jessica Rehbein	Paralegal	285.00	12.20	3,477.00
Current Professional Services			152.50	\$64,158.00

Professional Services

Date	Task	Description/Timekeeper	Hours	Amount
B110 - Case Administration				
01/03/24	B110	Travel to Syracuse for hearings on 1/4 (6.5). Logan Kugler	6.50	No Charge
01/05/24	B110	Return travel from Syracuse (6.0). Logan Kugler	6.00	No Charge
Total B110 - Case Administration			12.50	0.00
B115 - Mediation				
01/04/24	B115	Prepare for and attend hearing on Travelers motion regarding mediation stay (.5). Robert T Kugler	0.50	275.00
01/04/24	B115	Review emails with Schnitzer regarding settlement (.5). Robert T Kugler	0.50	275.00
01/05/24	B115	Analyze and address issues relating to potential insurer settlements and remaining options for resolution (.3). Edwin H Caldie	0.30	165.00
01/05/24	B115	Review proposed order regarding mediation stay (.4). Robert T Kugler	0.40	220.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/05/24	B115	Review comments and revisions to proposed order regarding lifting mediation stay (.5). Robert T Kugler	0.50	275.00
01/05/24	B115	Review emails between Donato and Schnitzer regarding 9019 motion (.4). Robert T Kugler	0.40	220.00
01/06/24	B115	Assess order terminating mediation stay (.1). Logan Kugler	0.10	39.00
01/10/24	B115	Analyze communications and issues relating to potential insurer settlements (.3). Edwin H Caldie	0.30	165.00
01/10/24	B115	Evaluate impact of recent order lifting mediation stay and address related questions (.4). Edwin H Caldie	0.40	220.00
01/10/24	B115	Review correspondence with Utica regarding settlement agreement (.4). Robert T Kugler	0.40	220.00
01/12/24	B115	Review revisions to TNCRRG settlement agreement from Debtor (.8). Robert T Kugler	0.80	440.00
01/12/24	B115	Review TNCRRG emails regarding meet and confer regarding settlement agreement (.6). Robert T Kugler	0.60	330.00
01/14/24	B115	Review strategy regarding TNCRRG settlement (.6). Robert T Kugler	0.60	330.00
01/16/24	B115	Prepare for and attend conference call with counsel for TNCRRG and Debtor regarding revisions to settlement agreement (.7). Christopher Sevedge	0.70	266.00
01/16/24	B115	Review correspondence with TNCRRG and Debtor regarding 9019 motion (.5). Robert T Kugler	0.50	275.00
01/16/24	B115	Participate in meeting with National Catholic and Diocese regarding settlement finalization (.3). Logan Kugler	0.30	117.00
01/16/24	B115	Assess status of 9019 motion for National Catholic (.2). Logan Kugler	0.20	78.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/17/24	B115	Review emails with Utica counsel regarding settlement (.6). Robert T Kugler	0.60	330.00
01/18/24	B115	Correspondence with counsel for Utica regarding settlement discussions and with Mr. Caldie regarding same (.4). Christopher Sevedge	0.40	152.00
01/19/24	B115	Review emails with Cygal regarding settlement (.6). Robert T Kugler	0.60	330.00
01/19/24	B115	Review emails with Utica counsel regarding settlement (.4). Robert T Kugler	0.40	220.00
01/22/24	B115	Attend conference call with counsel for Utica and counsel for Diocese regarding template settlement agreement and contemplation of potential revisions to same (.7). Christopher Sevedge	0.70	266.00
01/22/24	B115	Work on analysis of issues raised on settlement call by counsel for Utica (.6). Christopher Sevedge	0.60	228.00
01/22/24	B115	Review status of Utica negotiations (.9). Robert T Kugler	0.90	495.00
01/23/24	B115	Review status of TNCRRG agreement (.5) Robert T Kugler	0.50	275.00
01/31/24	B115	Confer with Committee Chair regarding plan, disclosure statement, and confirmation issues (.6). Edwin H Caldie	0.60	330.00
Total B115 - Mediation			12.80	6,536.00

B120 - Asset Analysis and Recovery

01/04/24	B120	Work session with team concerning global case strategy and insurance issues (.1). Christopher Sevedge	0.10	38.00
01/04/24	B120	Review strategy regarding adv pro regarding coverage issues (.7).	0.70	385.00

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Date	Task	Description/Timekeeper	Hours	Amount
		Robert T Kugler		
01/05/24	B120	Review strategy regarding adv proceeding regarding coverage matters (.7). Robert T Kugler	0.70	385.00
01/09/24	B120	Review strategy regarding insurance coverage maximization (.7). Robert T Kugler	0.70	385.00
01/18/24	B120	Work session with team concerning global case strategy and insurance issues (.2). Christopher Sevedge	0.20	76.00
01/19/24	B120	Develop insurance resolution strategy (.8). Robert T Kugler	0.80	440.00
01/22/24	B120	Correspondence with Mr. Kugler and Mr. Caldie regarding call with counsel for Utica on issues pertaining to settlement agreement and adversary proceeding response (.4). Christopher Sevedge	0.40	152.00
01/26/24	B120	Assess status of insurer actions in adversary proceeding and necessary actions as related to confirmation proceedings (.4). Logan Kugler	0.40	156.00
Total B120 - Asset Analysis and Recovery			4.00	2,017.00

B150 - Meetings of and Comm. with Creditors

01/02/24	B150	Prepare update to Committee website and coordinate posting (.5). Logan Kugler	0.50	195.00
01/03/24	B150	Communicate with committee member regarding case status and outstanding plan issues (.4). Edwin H Caldie	0.40	220.00
01/03/24	B150	Emails to Committee members regarding upcoming hearing (.2). Logan Kugler	0.20	78.00
01/04/24	B150	Prepare for and attend hearing on Committee 2004 motion (.4).	0.40	220.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		Robert T Kugler		
01/04/24	B150	Telephone conference with bankruptcy team regarding ongoing case issues and strategy (.5). Logan Kugler	0.50	195.00
01/04/24	B150	Email to state court counsel regarding plan status (.2). Logan Kugler	0.20	78.00
01/04/24	B150	Review email to Committee members with update (.1). Logan Kugler	0.10	39.00
01/04/24	B150	Prepare agenda for committee meeting (.3). Jessica Rehbein	0.30	85.50
01/04/24	B150	Analyze notices of continued hearings, calendar hearing dates for team, and update case chart (.2) Jessica Rehbein	0.20	57.00
01/04/24	B150	Revise and update case chart for team strategy call (.1) Jessica Rehbein	0.10	28.50
01/05/24	B150	Draft and circulate case update to survivors' attorneys and address follow-up questions (.7). Edwin H Caldie	0.70	385.00
01/05/24	B150	Review emails with Committee survivors regarding status (.5). Robert T Kugler	0.50	275.00
01/05/24	B150	Email to Committee members regarding next meeting (.1). Logan Kugler	0.10	39.00
01/08/24	B150	Communicate with survivor attorneys regarding case developments, anticipated plan confirmation timing, and claim review mechanics and timing (.3). Edwin H Caldie	0.30	165.00
01/08/24	B150	Telephone conference survivor counsel regarding status (.3). Robert T Kugler	0.30	165.00
01/09/24	B150	Address questions from the Committee regarding the status of ongoing plan negotiations (.3). Edwin H Caldie	0.30	165.00
01/09/24	B150	Provide update to survivors' attorney representing a Committee member (.2).	0.20	110.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		Edwin H Caldie		
01/09/24	B150	Prepare agenda for Committee meeting (.4). Logan Kugler	0.40	156.00
01/09/24	B150	Communications with Committee member regarding fee reimbursement (.1). Logan Kugler	0.10	39.00
01/09/24	B150	Update agenda for team meeting (.1). Jessica Rehbein	0.10	28.50
01/10/24	B150	Prepare for and attend Committee meeting (1.5). Robert T Kugler	1.50	825.00
01/10/24	B150	Attend Committee meeting (1.1). Logan Kugler	1.10	429.00
01/11/24	B150	Telephone conference with team regarding case issues and strategy (.8). Logan Kugler	0.80	312.00
01/11/24	B150	Prepare agenda for team strategy call (.1). Jessica Rehbein	0.10	28.50
01/11/24	B150	Confer with Mr. Kugler and Mr. Caldie regarding global case strategy, outstanding confirmation issues, and update chart (.4). Jessica Rehbein	0.40	114.00
01/12/24	B150	Review communications and respond to questions from creditor representative regarding plan timing issues (.2). Edwin H Caldie	0.20	110.00
01/12/24	B150	Provide update to Committee on the status of plan issues (.3). Edwin H Caldie	0.30	165.00
01/15/24	B150	Address question from survivor counsel on timing for disclosure statement approval and anticipated obstacles to the same (.1). Edwin H Caldie	0.10	55.00
01/16/24	B150	Prepare for, and participate in settlement call with TNCRRG and debtor's counsel (.5). Edwin H Caldie	0.50	275.00
01/16/24	B150	Draft and circulate case update in response to claimant counsel inquiry (.3).	0.30	165.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		Edwin H Caldie		
01/16/24	B150	Telephone conference with Committee member regarding child protection and plan issues (.5). Logan Kugler	0.50	195.00
01/17/24	B150	Review and revise recommended, potential update to survivor website and evaluate issues relating to plan solicitation and related rules (.6). Edwin H Caldie	0.60	330.00
01/17/24	B150	Assess outstanding issues and tasks for addition to case tracking chart and email to Ms. Rehbein regarding same (.2). Logan Kugler	0.20	78.00
01/17/24	B150	Prepare agenda for team strategy call (.1). Jessica Rehbein	0.10	28.50
01/18/24	B150	Address questions regarding child protection and the status of agreed-upon measures (.6). Edwin H Caldie	0.60	330.00
01/18/24	B150	Analyze and address inquiries from state court counsel regarding claim information (1.4). Jessica Rehbein	1.40	399.00
01/22/24	B150	Review emails with Committee members regarding CPP's (.5). Robert T Kugler	0.50	275.00
01/22/24	B150	Assess email from Committee member regarding status of protection protocols (.1). Logan Kugler	0.10	39.00
01/22/24	B150	Review and update task list (.2). Logan Kugler	0.20	78.00
01/23/24	B150	Review emails with Committee members regarding status (.5). Robert T Kugler	0.50	275.00
01/23/24	B150	Review email from Committee member regarding protection protocol issues (.2). Logan Kugler	0.20	78.00
01/23/24	B150	Address claimant inquiry regarding types of claim and treatment under the plan (.5). Logan Kugler	0.50	195.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
01/23/24	B150	Address inquiry from state court counsel regarding case status (.3). Logan Kugler	0.30	117.00
01/23/24	B150	Respond to survivor voicemail (.1). Logan Kugler	0.10	39.00
01/24/24	B150	Address inquiry regarding next Committee meeting (.1). Logan Kugler	0.10	39.00
01/24/24	B150	Telephone conference with Syracuse survivor regarding case status (.2). Logan Kugler	0.20	78.00
01/25/24	B150	Telephone conference with state court counsel regarding status (.4). Robert T Kugler	0.40	220.00
01/25/24	B150	Assist with plan for next Committee meeting (.1). Logan Kugler	0.10	39.00
01/25/24	B150	Updates to case issues and tracking chart (.3). Logan Kugler	0.30	117.00
01/26/24	B150	Address questions relating to child protection measures and their impact on the plan confirmation process (.3). Edwin H Caldie	0.30	165.00
01/26/24	B150	Draft email to Committee regarding status (.6). Robert T Kugler	0.60	330.00
01/26/24	B150	Review emails from Committee members regarding Disclosure Statement hearing (.5). Robert T Kugler	0.50	275.00
01/26/24	B150	Case check in call (.5). Logan Kugler	0.50	195.00
01/26/24	B150	Participate in case check in call (.5). Logan Kugler	0.50	195.00
01/26/24	B150	Email with Committee member regarding disclosure statement hearing (.2). Logan Kugler	0.20	78.00
01/26/24	B150	Confer with Mr. Kugler and Mr. Caldie regarding global case strategy and update case chart (.3). Jessica Rehbein	0.30	85.50

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
01/29/24	B150	Assess emails from state court counsel regarding Disclosure Statement hearing strategy (.4). Robert T Kugler	0.40	220.00
01/29/24	B150	Prepare reply in support of disclosure statement objection, building format and incorporating relevant case law (.7). Logan Kugler	0.70	273.00
01/29/24	B150	Address inquiry regarding claimant's claim (.2). Logan Kugler	0.20	78.00
01/30/24	B150	Address questions from Committee member regarding outstanding discussion points on child protection (.2). Edwin H Caldie	0.20	110.00
01/30/24	B150	Communicate with Committee member regarding concerns over the disclosure statement approval process (.3). Edwin H Caldie	0.30	165.00
01/30/24	B150	Communicate with Committee member regarding concerns over the disclosure statement approval process (.3). Edwin H Caldie	0.30	165.00
01/30/24	B150	Telephone conference with state court counsel regarding status (.4). Robert T Kugler	0.40	220.00
01/31/24	B150	Prepare communication to the Committee regarding recent filings, including disclosure statement objections (.3). Edwin H Caldie	0.30	165.00
Total B150 - Meetings of and Comm. with Creditors			23.80	10,871.00

B160 - Fee/Employment Applications

01/02/24	B160	Prepare monthly fee statement (1.0). Logan Kugler	1.00	390.00
01/06/24	B160	Update to Monthly Fee Statement (.1). Logan Kugler	0.10	39.00
01/08/24	B160	Revise and finalize monthly fee statement (.2).	0.20	57.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		Jessica Rehbein		
01/08/24	B160	Confirm internally and on the docket that no objections were filed to Stinson and Burns Bair's monthly fee statements, prepare and file Certificate of No Objection, and prepare notice to debtor and Interstate regarding their portion of the fees owed (.3). Jessica Rehbein	0.30	85.50
01/09/24	B160	Review and approve monthly fee statement for December (.2). Logan Kugler	0.20	78.00
01/10/24	B160	Finalize and file December monthly fee statement for Stinson (.2). Jessica Rehbein	0.20	57.00
01/16/24	B160	Address status of committee member reimbursements (.2). Logan Kugler	0.20	78.00
01/23/24	B160	Finalize and file Burns Bair Monthly Fee Statement for December (.1). Jessica Rehbein	0.10	28.50
01/25/24	B160	Evaluate fee payment issues and email to Debtors' counsel regarding same (.4). Logan Kugler	0.40	156.00
01/25/24	B160	Confirm internally and on the docket that no objections had been filed to Stinson's December monthly fee statement, prepare Certificate of No Objection, and file Certificate of No Objection (.2). Jessica Rehbein	0.20	57.00
01/29/24	B160	Address issues related to Diocese overpayment and emails regarding reverting amounts (.4). Logan Kugler	0.40	156.00
01/31/24	B160	Telephone conference with Debtors' counsel regarding fee statement issues (.2). Logan Kugler	0.20	78.00
Total B160 - Fee/Employment Applications			3.50	1,260.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
B170 - Fee/Employment Objections				
01/06/24	B170	Assess Blank Rome monthly fee statement for November (.1). Logan Kugler	0.10	39.00
Total B170 - Fee/Employment Objections			0.10	39.00
B190 - Other Contested Matters				
01/02/24	B190	Review issues regarding privilege and work product (.7). Robert T Kugler	0.70	385.00
01/02/24	B190	Assess updates in related cases for impact on instant case (.3). Logan Kugler	0.30	117.00
01/02/24	B190	Review issues for 1/4 hearing and prepare related information (.4). Logan Kugler	0.40	156.00
01/22/24	B190	Review text order regarding adjournment of SB motion (.2). Robert T Kugler	0.20	110.00
01/22/24	B190	Assess docket entry related to SB continuation (.1). Logan Kugler	0.10	39.00
01/23/24	B190	Evaluate ongoing developments in related Diocesan bankruptcy cases (.5). Logan Kugler	0.50	195.00
01/29/24	B190	Evaluate filing in related cases that could impact developments in instant case (.6). Logan Kugler	0.60	234.00
Total B190 - Other Contested Matters			2.80	1,236.00
B310 - Claims Administration and Objections				
01/08/24	B310	Analyze additional claims filed and update claims chart (.5).	0.50	142.50

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		Jessica Rehbein		
01/11/24	B310	Review correspondence to Donato regarding additional claim (.4). Robert T Kugler	0.40	220.00
Total B310 - Claims Administration and Objections			0.90	362.50
B320 - Plan/Disclosure Statement Incl. Bus Plan				
01/02/24	B320	Analyze communications and issues relating to potential insurer settlements (.4). Edwin H Caldie	0.40	220.00
01/02/24	B320	Address questions relating to claim review and timing posed by anticipated tort claim reviewer (.2). Edwin H Caldie	0.20	110.00
01/02/24	B320	Review emails with Donato regarding open issues for confirmation and upcoming hearing (.6). Robert T Kugler	0.60	330.00
01/02/24	B320	Analyze outstanding plan and confirmation issues and tasks and update chart (.3). Jessica Rehbein	0.30	85.50
01/03/24	B320	Evaluate information relating to upcoming hearing on status and confirmation timing issues (.2). Edwin H Caldie	0.20	110.00
01/03/24	B320	Analyze filings and communications by non-settling insurers and evaluate likely plan objections and related strategies (.5). Edwin H Caldie	0.50	275.00
01/03/24	B320	Review and revise Litigation Claimant Agreement from Debtor (.7). Robert T Kugler	0.70	385.00
01/03/24	B320	Review Abuse Claimant Release Agreement (.8). Robert T Kugler	0.80	440.00
01/03/24	B320	Review Debtor revision to Trust Agreement (.8). Robert T Kugler	0.80	440.00
01/03/24	B320	Review Debtor revision to trust Distribution procedures	0.80	440.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		(.8). Robert T Kugler		
01/03/24	B320	Review edits to plan exhibits and correspond with Mr. Kugler and Mr. Caldie regarding same (.3). Logan Kugler	0.30	117.00
01/03/24	B320	Updates to plan exhibits to conform with plan (1.2). Logan Kugler	1.20	468.00
01/03/24	B320	Email BSK regarding plan exhibits and filing (.1). Logan Kugler	0.10	39.00
01/03/24	B320	Assess emails regarding hearing approach amongst parties (.1). Logan Kugler	0.10	39.00
01/04/24	B320	Evaluate issues relating to confirmation schedule (.3). Edwin H Caldie	0.30	165.00
01/04/24	B320	Prepare information and address questions relating to the hearing on plan and disclosure statement issues (.4). Edwin H Caldie	0.40	220.00
01/04/24	B320	Review emails with Donato regarding hearing matters and updates (.6). Robert T Kugler	0.60	330.00
01/04/24	B320	Prepare for and attend status conference on plan and Disclosure statement (.7). Robert T Kugler	0.70	385.00
01/04/24	B320	Review statement regarding plan supplement file by the debtor (.5). Robert T Kugler	0.50	275.00
01/04/24	B320	Review strategy regarding CPP (.5). Robert T Kugler	0.50	275.00
01/04/24	B320	Review Order and Notice Setting Hearing on Disclosure Statement (.3). Robert T Kugler	0.30	165.00
01/04/24	B320	Assist with preparation for hearing on Disclosure Statement schedule hearing (.3). Logan Kugler	0.30	117.00
01/04/24	B320	Assist with preparation for hearing on CPP issues (.3). Logan Kugler	0.30	117.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/04/24	B320	Attend hearing on DS, termination motion, status conferences, etc (1.0). Logan Kugler	1.00	390.00
01/04/24	B320	Confer with Mr. Kugler regarding cpp solution and related communications with Debtor (.4). Logan Kugler	0.40	156.00
01/04/24	B320	Analyze and address strategy related to potential insurer plan and disclosure statement arguments (.3). Logan Kugler	0.30	117.00
01/04/24	B320	Confer with Mr. Kugler regarding hearing results, stay termination, and impact on confirmation (.4). Logan Kugler	0.40	156.00
01/04/24	B320	Attention to plan exhibit filing and impact on hearing (.2). Logan Kugler	0.20	78.00
01/04/24	B320	Analyze order setting hearing on Disclosure Statement, calendar hearing and deadline for team, and add information to case chart (.2). Jessica Rehbein	0.20	57.00
01/04/24	B320	Confer with Mr. Caldie regarding outstanding settlement issues and remaining child protection issues (.3). Jessica Rehbein	0.30	85.50
01/05/24	B320	Review provisions of filed plan relating to claim review and organize related process (.4). Edwin H Caldie	0.40	220.00
01/05/24	B320	Address questions relating to the timing for approval of the disclosure statement (.2). Edwin H Caldie	0.20	110.00
01/06/24	B320	Review Court's order on disclosure statement hearing (.1). Logan Kugler	0.10	39.00
01/08/24	B320	Analyze insurer positions relating to the disclosure statement approval plan confirmation (.3). Edwin H Caldie	0.30	165.00
01/08/24	B320	Evaluate information and Committee positions relating to upcoming hearing on disclosure statement approval (.4).	0.40	220.00

Stinson LLP

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Date	Task	Description/Timekeeper	Hours	Amount
		Edwin H Caldie		
01/08/24	B320	Analyze outstanding plan and confirmation issues and update chart (.4). Jessica Rehbein	0.40	114.00
01/09/24	B320	Review provisions of filed plan relating to late claim treatment and address related questions (.4). Edwin H Caldie	0.40	220.00
01/09/24	B320	Address questions relating to the timing for confirmation (.3). Edwin H Caldie	0.30	165.00
01/09/24	B320	Review strategy regarding survivor role in confirmation proceeding (.6). Robert T Kugler	0.60	330.00
01/09/24	B320	Review Statement Regarding:(Notice of Filing of Second Plan Supplement to Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York Dated December 6, 2023 and Disclosure Statement) (.9). Robert T Kugler	0.90	495.00
01/09/24	B320	Assess liquidation analysis (.2). Logan Kugler	0.20	78.00
01/09/24	B320	Assess assumption schedule (.2). Logan Kugler	0.20	78.00
01/09/24	B320	Assess cash flow projection (.2). Logan Kugler	0.20	78.00
01/09/24	B320	Analyze timelines and confirmation issues regarding other catholic diocese for implications in instant case (.9). Jessica Rehbein	0.90	256.50
01/09/24	B320	Analyze claims for Medicare implications (1.9). Jessica Rehbein	1.90	541.50
01/10/24	B320	Analyze plan issues and discuss with L. Kugler regarding same (.5). Andrew Glasnovich	0.50	227.50
01/10/24	B320	Analyze and respond to question relating to claim supplementation post-confirmation and provide related information to survivor attorney (.4).	0.40	220.00

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Date	Task	Description/Timekeeper	Hours	Amount
		Edwin H Caldie		
01/10/24	B320	Assess issues related to child protection issues and developments in related cases (.4). Logan Kugler	0.40	156.00
01/10/24	B320	Assess insurer arguments bearing on confirmation and disclosure statement (.3). Logan Kugler	0.30	117.00
01/11/24	B320	Review communications and recent filings and address Committee questions regarding the confirmation process (.6). Edwin H Caldie	0.60	330.00
01/11/24	B320	Evaluate issues relating to timing for approval of the disclosure statement and review related requirements for notice and balloting (.4). Edwin H Caldie	0.40	220.00
01/11/24	B320	Review confirmation status and open issues (.6). Robert T Kugler	0.60	330.00
01/11/24	B320	Review liq analysis and financial projections (.8). Robert T Kugler	0.80	440.00
01/11/24	B320	Evaluate issues and strategy related to potential confirmation litigation (.4). Logan Kugler	0.40	156.00
01/11/24	B320	Review assessment of potential Medicare claims (.1). Logan Kugler	0.10	39.00
01/11/24	B320	Evaluate outstanding issues and tasks for completion relevant to disclosure statement hearing (.2). Logan Kugler	0.20	78.00
01/11/24	B320	Analyze claims for potential CMS noticing issues and prepare summary for Mr. Kugler (.4). Jessica Rehbein	0.40	114.00
01/12/24	B320	Assess filings relevant to child protection resolution issues (.7). Logan Kugler	0.70	273.00
01/12/24	B320	Analyze potential disclosure statement/confirmation objections (.7). Logan Kugler	0.70	273.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/15/24	B320	Evaluate timing issues relating to disclosure statement approval (.3). Edwin H Caldie	0.30	165.00
01/15/24	B320	Analyze strategy and address questions regarding ongoing negotiations with the Debtor on child protection issues (.4). Edwin H Caldie	0.40	220.00
01/15/24	B320	Review emails with Donato regarding CPP open issues (.4). Robert T Kugler	0.40	220.00
01/15/24	B320	Emails with BRG regarding liquidation analysis and projection (.2). Logan Kugler	0.20	78.00
01/15/24	B320	Assess emails regarding TNCRRG settlement and review related edits to settlement agreement (.3). Logan Kugler	0.30	117.00
01/16/24	B320	Review internal memorandum on trust operating and formulation procedures and outline strategy for implementation (.2). Edwin H Caldie	0.20	110.00
01/16/24	B320	Review correspondence with Debtor regarding Solicitation Procedures motion (.3). Robert T Kugler	0.30	165.00
01/16/24	B320	Review Solicitation Procedures motion (.6). Robert T Kugler	0.60	330.00
01/16/24	B320	Review status of TNCRRG settlement motion (.4). Robert T Kugler	0.40	220.00
01/16/24	B320	Initial review of disclosure statement and solicitation procedures motion and email to Debtor regarding same (.8). Logan Kugler	0.80	312.00
01/16/24	B320	Evaluate potential disclosure statement objections (.4). Logan Kugler	0.40	156.00
01/16/24	B320	Analyze and prepare summary of confirmation issues in other diocesan cases for implications in instant case (.7). Jessica Rehbein	0.70	199.50

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Date	Task	Description/Timekeeper	Hours	Amount
01/17/24	B320	Telephone conference Sullivan regarding CPP (.4). Robert T Kugler	0.40	220.00
01/17/24	B320	Review developing case law in Diocesan cases relevant to confirmation (.8). Robert T Kugler	0.80	440.00
01/17/24	B320	Address issues related to disclosure statement motion/proposed order (.3). Logan Kugler	0.30	117.00
01/17/24	B320	Analyze notice of disclosure statement hearing and motion for approval of disclosure statement and add deadlines to case chart and calendar (.2). Jessica Rehbein	0.20	57.00
01/18/24	B320	Correspondence with Ms. Smith and Ms. North regarding research and analysis for anticipated upcoming briefing on confirmation with respect to insurance issues (.3). Christopher Sevedge	0.30	114.00
01/18/24	B320	Prepare for, and participate in discussion regarding ongoing opportunities for insurer settlement and evaluate related communications (.3). Edwin H Caldie	0.30	165.00
01/18/24	B320	Evaluate disclosure statement issues and briefing schedule and emails regarding same (.3). Logan Kugler	0.30	117.00
01/18/24	B320	Analyze strategy and timing issues for disclosure statement objections and confer with Mr. Kugler regarding timing (.2). Jessica Rehbein	0.20	57.00
01/18/24	B320	Analyze outstanding confirmation and child protection protocol issues and update chart (.3). Jessica Rehbein	0.30	85.50
01/18/24	B320	Confer with Mr. Kugler regarding timing on disclosure statement objections and committee strategy (.2). Jessica Rehbein	0.20	57.00
01/19/24	B320	Review and evaluate filings and decisions relating to the treatment of insurer rights in the context of plan confirmation in Diocese cases and construct related outline (1.1).	1.10	605.00

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Date	Task	Description/Timekeeper	Hours	Amount
		Edwin H Caldie		
01/23/24	B320	Telephone conference with Diocese counsel regarding CPP status (.4). Robert T Kugler	0.40	220.00
01/23/24	B320	Review analysis of late filed claims provisions (.7) Robert T Kugler	0.70	385.00
01/23/24	B320	Prepare materials for disclosure statement hearing (.2). Logan Kugler	0.20	78.00
01/24/24	B320	Review insurance strategy regarding Disclosure Statement hearing (.8). Robert T Kugler	0.80	440.00
01/24/24	B320	Evaluate solicitation procedures motion (.7). Logan Kugler	0.70	273.00
01/24/24	B320	Assist with strategy for hearing on disclosure statement and dealing with objections (.7). Logan Kugler	0.70	273.00
01/24/24	B320	Assist with child protection protocol resolution (.2). Logan Kugler	0.20	78.00
01/24/24	B320	Analyze outstanding disclosure statement hearing and confirmation issues, and update agenda for team meeting (.4). Jessica Rehbein	0.40	114.00
01/25/24	B320	Prepare outline of draft reply to anticipated insurer objections to the disclosure statement (.8). Edwin H Caldie	0.80	440.00
01/25/24	B320	Review analysis of solicitation procedures motion (.4). Robert T Kugler	0.40	220.00
01/25/24	B320	Detailed review of solicitation procedures motion and provide comments internally regarding potential issues (2.6). Logan Kugler	2.60	1,014.00
01/25/24	B320	Prepare for confirmation objections by reviewing related pleadings and case law (.5). Logan Kugler	0.50	195.00
01/26/24	B320	Work session with team concerning global case strategy and insurance issues (.2).	0.20	76.00

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Date	Task	Description/Timekeeper	Hours	Amount
		Christopher Sevedge		
01/26/24	B320	Work session between Burns Bair & Stinson regarding global case strategy, upcoming hearings, settlement negotiations (.2). Christopher Sevedge	0.20	76.00
01/26/24	B320	Review summary of insurer arguments to date and formulate responsive positions (.5). Edwin H Caldie	0.50	275.00
01/26/24	B320	Meeting with FA regarding confirmation issues (.2). Robert T Kugler	0.20	110.00
01/26/24	B320	Email to Diocese regarding solicitation procedures motion (.3). Logan Kugler	0.30	117.00
01/26/24	B320	Assess R. Kugler email to Committee regarding plan and disclosure statement (.1). Logan Kugler	0.10	39.00
01/26/24	B320	Check in call with BRG regarding liquidation analysis and financial projections in disclosure statement (.2). Logan Kugler	0.20	78.00
01/26/24	B320	Evaluate article related to insurer standing (.1). Logan Kugler	0.10	39.00
01/29/24	B320	Evaluate emails with Stout regarding analysis and questions (.6). Robert T Kugler	0.60	330.00
01/29/24	B320	Confer with Mr. Kugler and Mr. Caldie regarding outstanding confirmation issues and child protection protocol status, and update chart (.4). Jessica Rehbein	0.40	114.00
01/30/24	B320	Evaluate strategy and logistics relating to disclosure statement objections (.4). Edwin H Caldie	0.40	220.00
01/30/24	B320	Review Disclosure Statement objection by United State Trustee (.7). Robert T Kugler	0.70	385.00
01/30/24	B320	Prepare disclosure statement objection summary chart (.4). Logan Kugler	0.40	156.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/30/24	B320	Analyze UST's objection to disclosure statement and update objection summary chart detailing objections and responses for reply (2.4). Logan Kugler	2.40	936.00
01/30/24	B320	Confer with team regarding disclosure statement reply preparation (.1). Logan Kugler	0.10	39.00
01/30/24	B320	Prepare Disclosure Statement reply (4.3). Logan Kugler	4.30	1,677.00
01/30/24	B320	Analyze LMI objection to disclosure statement and update objection summary chart detailing objections and responses for reply (1.8). Logan Kugler	1.80	702.00
01/30/24	B320	Read Interstate's objection to disclosure statement motion (.8). Logan Kugler	0.80	312.00
01/30/24	B320	Read Travelers' objection/joiner to disclosure statement motion (.4). Logan Kugler	0.40	156.00
01/31/24	B320	Telephone conference with L. Kugler on DS objections and strategy for response (.3). Andrew Glasnovich	0.30	136.50
01/31/24	B320	Evaluate insurer objections to approval of the disclosure statement and develop and organize related strategies for response (1.6). Edwin H Caldie	1.60	880.00
01/31/24	B320	Review disclosure statement objection filed by London Market Insurer (1.4). Robert T Kugler	1.40	770.00
01/31/24	B320	Review Disclosure Statement objection filed by Interstate (1.4). Robert T Kugler	1.40	770.00
01/31/24	B320	Review Disclosure Statement objection filed by Ace (1.1). Robert T Kugler	1.10	605.00
01/31/24	B320	Review joiner filed Travelers to London Market Insurer and Interstate Disclosure Statement objection (.3).	0.30	165.00

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Date	Task	Description/Timekeeper	Hours	Amount
		Robert T Kugler		
01/31/24	B320	Assess strategy regarding Disclosure Statement hearing and confirmation process in light of Disclosure Statement objections (1.4). Robert T Kugler	1.40	770.00
01/31/24	B320	Analyze Travelers objection to DS and update objection summary chart (.8). Logan Kugler	0.80	312.00
01/31/24	B320	Analyze Westchester objection to DS and update objection summary chart (1.6). Logan Kugler	1.60	624.00
01/31/24	B320	Confer with team members regarding disclosure statement objections and reply preparation (1.4). Logan Kugler	1.40	546.00
01/31/24	B320	Analyze Interstate objection to DS and update objection summary chart (3.2). Logan Kugler	3.20	1,248.00
01/31/24	B320	Prepare reply to Disclosure Statement objections (5.8). Logan Kugler	5.80	2,262.00
01/31/24	B320	Prepare binder for Mr. Kugler, Mr. Caldie, and Mr. Kugler for hearing on Disclosure Statement (.4). Jessica Rehbein	0.40	114.00
01/31/24	B320	Research disclosure statement orders and filings in other diocesan cases to aid in disclosure statement objection responses and hearing preparation (.5). Jessica Rehbein	0.50	142.50
Total B320 - Plan/Disclosure Statement Incl. Bus Plan			80.70	35,909.50

B500 - Interstate Disclosure

12/01/23	B500	Correspondence relating to the same (.2). Zachary Hemenway	0.20	100.00
12/01/23	B500	Begin drafting outline for informal interview with ISO (.8) Zachary Hemenway	0.80	400.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/03/24	B500	Review emails with Haskins regarding Interstate disclosure hearing (.3). Robert T Kugler	0.30	165.00
01/03/24	B500	Follow up on deposition scheduling and hearing details (.3). Zachary Hemenway	0.30	150.00
01/04/24	B500	Review strategy regarding Interstate disclosure hearing (.4). Robert T Kugler	0.40	220.00
01/04/24	B500	Review correspondence with Haskins and Allison regarding Interstate disclosure hearing (.5). Robert T Kugler	0.50	275.00
01/04/24	B500	Prepare for and attend status conference on Interstate disclosure issues (.6). Robert T Kugler	0.60	330.00
01/04/24	B500	Assist with preparation for hearing on Interstate disclosure issue (.3). Logan Kugler	0.30	117.00
01/05/24	B500	Review emails regarding bar date order and confidentiality (.4). Robert T Kugler	0.40	220.00
01/12/24	B500	Review communications regarding ongoing investigation and discuss status and next steps with estate claimant representatives (.6). Edwin H Caldie	0.60	330.00
01/15/24	B500	Review emails with Haskins regarding depo regarding Interstate disclosure (.5). Robert T Kugler	0.50	275.00
01/15/24	B500	Evaluate correspondence with ISO counsel (.2). Zachary Hemenway	0.20	100.00
01/15/24	B500	Follow up on deposition planning and scope (.3). Zachary Hemenway	0.30	150.00
01/16/24	B500	Review emails with Haskins regarding Interstate Disclosure (.4). Robert T Kugler	0.40	220.00
01/17/24	B500	Evaluate update on progress with Interstate and provide guidance relating to potential interplay with	0.30	165.00

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Date	Task	Description/Timekeeper	Hours	Amount
		confirmation timing and issues (.3). Edwin H Caldie		
01/23/24	B500	Telephone conference state court counsel regarding status (.5). Robert T Kugler	0.50	275.00
01/23/24	B500	Review produced documents and identify priorities for call with ISO counsel (.8). Zachary Hemenway	0.80	400.00
01/23/24	B500	Participate in and follow up on call (.5). Zachary Hemenway	0.50	250.00
01/24/24	B500	Review communications regarding ongoing investigation and attempts to obtain information and evaluate potential impact on plan confirmation process (.4). Edwin H Caldie	0.40	220.00
01/25/24	B500	Review emails with Haskins regarding deposition scheduling regarding Interstate Disclosure (.4). Robert T Kugler	0.40	220.00
01/25/24	B500	Evaluate fee payment issues and email to Interstate's counsel regarding same (.4). Logan Kugler	0.40	156.00
01/26/24	B500	Evaluate strategy and timing considerations relating to ongoing investigation (.4). Edwin H Caldie	0.40	220.00
01/26/24	B500	Assess emails related to Interstate investigation (.1). Logan Kugler	0.10	39.00
01/29/24	B500	Analyze strategy regarding Interstate Disclosure of survivor information (.6). Robert T Kugler	0.60	330.00
01/29/24	B500	Evaluate potential next steps for motion (.4). Zachary Hemenway	0.40	200.00
01/29/24	B500	Conference with Mr. Caldie and Mr. Kugler regarding case updates and strategy (.3). Zachary Hemenway	0.30	150.00
01/29/24	B500	Follow up regarding potential next steps for motion (.2). Zachary Hemenway	0.20	100.00

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Date	Task	Description/Timekeeper	Hours	Amount
01/31/24	B500	Evaluate correspondence from ISO counsel and impact of same (.3) Zachary Hemenway	0.30	150.00
Total B500 - Interstate Disclosure			11.40	5,927.00
Current Professional Services			152.50	\$64,158.00

Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	12.50	0.00
B115	Mediation	12.80	6,536.00
B120	Asset Analysis and Recovery	4.00	2,017.00
B150	Meetings of and Comm. with Creditors	23.80	10,871.00
B160	Fee/Employment Applications	3.50	1,260.00
B170	Fee/Employment Objections	0.10	39.00
B190	Other Contested Matters	2.80	1,236.00
B310	Claims Administration and Objections	0.90	362.50
B320	Plan/Disclosure Statement Incl. Bus Plan	80.70	35,909.50
B500	Interstate Disclosure	11.40	5,927.00
Current Professional Services		152.50	\$64,158.00

Disbursements

Date	Description	Amount
	Relativity Database Charges	100.00
01/02/24	Transcript to J & J Court Transcribers, Inc for Federal Court Expedited on Invoice 2024-00001	64.00
Total Disbursements		\$164.00

CERTIFICATE OF SERVICE

I, Jess Rehbein, hereby certify that on February 19, 2024, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF and that service was emailed to the following parties:

- a. The Roman Catholic Diocese of Syracuse, New York, 240 East Onondaga Street, Syracuse, New York 13202
- b. Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202, Attn: Stephen A. Donato
- c. Office of the United States Trustee, 10 Broad Street, Room 105, Utica, New York 13501, Attn: Erin P. Champion

Date: February 19, 2024

/s/ Jess Rehbein
Jess Rehbein